

AB:AXB

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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19M660

UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. § 963)

ADRIAN ROACH and
EARL FAIRWEATHER,
also known as "Early B,"

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

MICHAEL FLOOD, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

On or about July 19, 2019, within the Eastern District of New York and elsewhere, the defendants ADRIAN ROACH and EARL FAIRWEATHER, also known as "Early B," together with others, did knowingly and intentionally conspire to import into the United States from a place outside thereof 500 grams or more of a substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 952(a) and 960(b)(2)(B).

(Title 21, United States Code, Section 963)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI") and have been involved in the investigation of numerous cases involving narcotics conspiracies. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendants' criminal history records; and from reports of other law enforcement officers involved in the investigation.

2. On or about July 19, 2019, the defendant ADRIAN ROACH arrived at John F. Kennedy International Airport ("JFK Airport") located in Queens, New York, aboard JetBlue Airways Flight B6 958 from Queen Beatrix International Airport located in Oranjestad, Aruba. Among other things, ROACH was in possession of a red and black colored backpack.

3. At JFK Airport, Customs and Border Protection ("CBP") officers stopped the defendant ADRIAN ROACH for a border enforcement examination. During the border enforcement examination, ROACH appeared to be nervous. Specifically, ROACH was sweating and his carotid artery was pulsating. A pat-down of ROACH revealed anomalies in the area of ROACH's thighs. During a partial body search of ROACH, packages containing a white powdery substance were discovered wrapped around each of ROACH's upper thighs. CBP officers probed the substance and it field-tested positive for

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

the presence of cocaine. The gross weight of the packages that were affixed to ROACH's thighs was approximately 2,279.2 grams of cocaine. ROACH was placed under arrest.

4. After his arrest, the defendant ADRIAN ROACH was advised of his Miranda rights and waived them and agreed to speak with law enforcement. In substance and in part, ROACH stated that he knew the packages affixed to his thighs contained cocaine, that an individual called "Early B" had arranged for ROACH to transport the cocaine from Aruba to JFK Airport and that ROACH was to be paid \$6,000 in United States currency upon delivering the cocaine to "Early B" in the United States.

5. In the presence of law enforcement at JFK Airport, the defendant ADRIAN ROACH placed a call to the defendant EARL FAIRWEATHER, also known as "Early B," on telephone number (347) 801-2689. ROACH advised FAIRWEATHER that he had successfully arrived at JFK Airport. Shortly thereafter, FAIRWEATHER arrived at JFK Airport and met ROACH at the "arrivals" section of Terminal 5. Under the supervision of HSI Agents, ROACH approached FAIRWEATHER's vehicle and handed

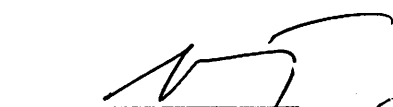
FAIRWEATHER the red and black colored backpack in a manner that suggested the imported cocaine was contained therein. FAIRWEATHER attempted to leave with the backpack, when he was arrested.

WHEREFORE, your deponent respectfully requests that the defendant ADRIAN ROACH and EARL FAIRWEATHER, also known as "Early B," be dealt with according to law.



MICHAEL FLOOD
Special Agent, United States Department of
Homeland Security, Homeland Security
Investigations

Sworn to before me this
20th day of July, 2019



THE HONORABLE S
UNITED STATES MA
EASTERN DISTRICT

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